

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

~~~~~

IN RE: NATIONAL PRESCRIPTION MDL No. 2804  
OPIATE LITIGATION

Case No. 17-md-2804

Judge Dan Aaron

This Document Relates To: Polster

The County of Lake, Ohio v.  
Purdue Pharma L.P., et al.  
Case No. 18-op-45032

The County of Trumbull, Ohio v.  
Purdue Pharma L.P., et al.,  
Case No. 18-op-45079

Track 3 Cases

~~~~~

Remote videotaped deposition of
NICOLE R. McCALLION

January 26, 2021
10:03 a.m.

Renee L. Pellegrino, RPR, CLR
(Appearing Remotely)

1 A. No, I wasn't aware.

2 Q. Have you read the complaint that was
3 filed by Lake County and Trumbull County in this
4 lawsuit?

5 A. I don't believe I have, outside of
6 the article I read last year.

7 Q. Do you think you might have read the
8 complaint as part of the article?

9 A. I don't remember seeing who was
10 involved. I think I would have remembered
11 seeing if Lake County was involved because I
12 live in Lake County, but it -- I don't think I
13 was aware that they were involved.

14 Q. What is your understanding of the
15 allegations against the Defendants in this
16 lawsuit?

17 A. That really wasn't expressed to me.
18 I -- I was asked pretty narrow questions about
19 my experience working with foster children, so
20 I don't really -- I don't know the scope of
21 exactly what's going on in the lawsuit.

22 Q. Do you know generally what the
23 lawsuit is about?

24 A. Generally, sure.

25 Q. What is your general understanding

1 I'm familiar with its name. I know that they
2 have mental health services. That's about all
3 I know about them. Their name is just familiar
4 with me.

5 Q. Have you worked with any parent of a
6 foster child you cared for who received services
7 from Signature Health?

8 A. I don't believe so.

9 Q. Outside of your experience with the
10 foster care system, do you know anyone
11 personally who has received services from
12 Signature Health?

13 A. I don't believe so.

14 Q. Ronna Johnson, how do you know her?

15 A. Ronna has done trainings in Lake
16 County for foster parents for as long as I've
17 been a foster parent, and I've also received
18 training from her in as far as caring for
19 children that had neonatal abstinence syndrome.

20 Q. When did you first meet Ms. Johnson?

21 A. I met her in 2011.

22 Q. Why did you meet Ms. Johnson in
23 2011?

24 A. She was the trainer when my husband
25 and I first started taking classes to be foster

1 parents.

2 Q. Where did you first take classes to
3 become foster parents?

4 A. At Lake County Job and Family
5 Services.

6 Q. Did you take classes from any
7 trainer other than Ms. Johnson?

8 A. Yes. We had about six weeks' worth
9 of training with Ronna Johnson, and then after
10 that we selected our own trainings and they all
11 had different teachers.

12 Q. Do you know how many trainings after
13 that six weeks' training with Ms. Johnson, how
14 many trainings have you taken from her?

15 A. I'm not sure. After that six
16 weeks, I've probably taken maybe seven to ten
17 trainings.

18 Q. Seven to ten trainings with
19 Ms. Johnson?

20 A. With, yes, that's correct.

21 Q. What were the topics of the seven to
22 ten additional trainings you took with
23 Ms. Johnson?

24 A. I can't remember. I would have to
25 look in my note.

1 Q. You said you took trainings for
2 foster care with her?

3 A. Correct.

4 Q. Did you take any trainings with
5 Ms. Johnson related to adoption?

6 A. I believe there was an
7 adoption-related training in that initial six
8 weeks.

9 Q. You mentioned NAS. What is your
10 understanding of what NAS stands for?

11 A. NAS is the collection of symptoms a
12 baby will have when they are born with a
13 substance in their system.

14 Q. What's the basis of your
15 understanding of what NAS means?

16 A. The basis of my understanding is
17 they will have unusual symptoms for a newborn
18 and that really varies from child to child.

19 Q. How did you learn about NAS?

20 A. At some point I believe I would
21 have had a training at Lake County about it.

22 Q. And when you say "a training at Lake
23 County," was that through Lake County Job and
24 Family Services?

25 A. Yes.

1 Q. Do you have any advanced degree
2 after your GED?

3 A. I do not.

4 Q. Do you have any professional
5 licenses or certifications?

6 A. I do not.

7 Q. You are currently a licensed foster
8 parent in Lake County; is that correct?

9 A. That's correct.

10 Q. What was your first job after high
11 school?

12 A. I worked at a pizza place. I made
13 pizzas and answered phones.

14 Q. What was the name of that pizza
15 place?

16 A. Longo's Pizza.

17 Q. Longo's?

18 A. L-O-N-G-O'S.

19 Q. And where is that located?

20 A. That's in Mentor, Ohio.

21 Q. Approximately how long did you work
22 for Longo's?

23 A. It was about eight years, from 1999
24 to 2007.

25 Q. From 1999 to 2007 did you have any

1 is that okay with you?

2 MR. BASHEIN: On mute. I
3 apologize.

4 MS. MORRISON: I asked Ms.
5 McCallion if now would be a good time for a
6 break or if she's comfortable keeping going for
7 another half hour or so before we break, and
8 she said she's good. Is that okay with you?

9 MR. BASHEIN: Yes, no problem.

10 Q. When did you become a licensed
11 foster parent in Lake County?

12 A. In September of 2012.

13 Q. Who administers the licensing for
14 foster parents in Lake County?

15 A. I -- I don't know who officially
16 does that. We got our license from Lake
17 County. I'm not sure what the formal -- who
18 actually does it.

19 Q. Do you know whether there's a
20 specific agency that licenses foster parents
21 other than the county itself?

22 A. Do you mean who issues the actual
23 license or who handles the process of it?

24 Q. Let's take both separately. Who
25 issues the actual license; do you know?

1 a trainer for foster parents?

2 A. I believe she's part of the Ohio --
3 I can't remember exactly what it's called, but
4 it's Ohio Regional Training Center, and she is
5 part of that network and somehow paid in that
6 way. But I don't know the mechanics of it.

7 Q. Where did you go to attend the
8 trainings to become a foster parent?

9 A. We went to Lake County Job and
10 Family Services.

11 Q. Do you know whether Lake County Job
12 and Family Services pays for the training for
13 foster parents?

14 A. I am not aware of that, no.

15 Q. You and your husband, Robert, are
16 both licensed foster parents in Lake County; is
17 that correct?

18 A. That's correct.

19 Q. You were named the 2017 Lake County
20 foster parents of the year, correct?

21 A. That's correct.

22 Q. Congratulations.

23 A. Thank you.

24 Q. Who selected you for that award?

25 A. I believe it was Lake County Job

1 Q. That's not something you've come to
2 learn as part of your work as a foster parent?

3 A. It's not.

4 Q. Are you aware of any federal or
5 State of Ohio regulations related to the
6 dispensing or filling of prescriptions?

7 A. I don't think I am.

8 Q. Are you aware of any federal or
9 State of Ohio regulations about the distribution
10 of controlled substances?

11 A. I don't think I am.

12 Q. We spoke earlier about illicit
13 opioids, and you identified heroin, correct?

14 A. Correct.

15 Q. Have you ever personally known
16 anyone who has used heroin?

17 A. I have. I'm sorry. I do know. I
18 haven't personally used.

19 Q. You know someone who has used
20 heroin?

21 A. Correct.

22 Q. Who do you know that has used
23 heroin?

24 A. Some of the parents of my foster
25 children.

1 A. My understanding is that the amount
2 of people struggling with opioid addiction
3 issues in comparison to our ability to support
4 that is causing a crisis.

5 Q. Do you think an opioid crisis exists
6 in Lake County?

7 A. I do.

8 Q. When do you think the opioid crisis
9 began in Lake County?

10 A. I don't have a frame of reference
11 for when it began. I personally learned more
12 about it as I worked with families in regard to
13 foster care.

14 Q. So you personally learned after you
15 started working in foster care in 2011 or 2012;
16 is that correct?

17 A. 2012, correct.

18 Q. You said your brother-in-law used
19 illicit fentanyl before he died in 2009?

20 MR. BASHEIN: Let me just note an
21 objection, Kristin. She said she heard that
22 from somebody who she does not recall. She did
23 not have personal knowledge. So just objection
24 to the form of the question.

25 Q. Let me restate that.

1 Q. Would you agree that addiction is
2 treatable?

3 A. I would.

4 Q. Are you familiar with children being
5 placed into foster care because a parent is
6 struggling with addiction?

7 A. I am.

8 Q. Are you aware of times when those
9 children who are placed into foster care because
10 a parent is struggling with addiction are able
11 to be reunited with that family member?

12 A. I am.

13 Q. And those children were able to be
14 reunited because the family member is receiving
15 treatment for their addiction, correct?

16 A. Correct.

17 MS. MORRISON: I think now is
18 probably a good time to take about a ten-minute
19 break. Does that work for you, Ms. McCallion?

20 THE WITNESS: Yeah. Should I -- do
21 I have to do anything to the screen or what
22 should I do?

23 MS. MORRISON: Let's go off the
24 record and then they can give you instructions
25 on that.

1 Q. To your knowledge, medical care for
2 foster children has been covered by their
3 Medicaid insurance?

4 A. Correct.

5 Q. Who is responsible for any mental
6 health-related care for foster children?

7 A. Lake County would be.

8 Q. Are you aware of any circumstances
9 where foster children have received mental
10 health services through Lake County?

11 A. I am aware, yes.

12 Q. Do you know who the service
13 providers are who provide mental health services
14 for foster children in Lake County?

15 A. I believe Crossroads is one. I
16 think Signature Health might be, too. I'm not
17 completely familiar enough to know for sure.

18 Q. Any others that you're aware of?

19 A. Not that I'm aware of, no.

20 Q. Do you know who pays for the mental
21 health services received by foster children in
22 Lake County?

23 A. I believe Medicaid pays for the
24 majority of that.

25 Q. How many children have you fostered

1 since 2012, not including your two adopted
2 children?

3 A. Not including my adopted children,
4 eight.

5 Q. So to keep this anonymous, I'm going
6 to go child number one. When did child number
7 one come into your care?

8 MR. GALLUCCI: Frank Gallucci. If
9 we could -- I understand that you're going to
10 go one through eight, but I don't know that we
11 should necessarily even take them in order for
12 the same concerns that were previously
13 expressed, so maybe if you could make it known
14 to the witness to take them in whatever order
15 she may want to.

16 Q. Mr. McCallion, would you be able to
17 provide an overview of the timeline of when
18 foster children have come into your care?

19 A. I believe I can.

20 Q. How about we try that to avoid any
21 personal identification for the children?

22 A. Okay. Are you asking about when
23 the first child came?

24 Q. Yes. Your first child, when you
25 received your first child, sort of the overview

1 of the timeline.

2 A. Okay. The first child came July of
3 2016.

4 Q. How old was that child?

5 A. Six weeks old.

6 Q. Do you know why that child was
7 placed into foster care?

8 A. That child had neonatal abstinence
9 syndrome.

10 Q. Do you know which substance that
11 child was exposed to?

12 A. She was exposed to heroin.

13 Q. How long was that child in your
14 care?

15 A. About nine months.

16 Q. Is this the same child we spoke
17 about generally earlier in relation to the
18 training you received with Ms. Johnson?

19 A. Yes, it is.

20 Q. When was the next child placed into
21 your care?

22 A. The next one was May of 2017.

23 Q. How old was that child?

24 A. 13.

25 Q. Do you have an understanding as to

1 why that child came into your care?

2 A. The parent was struggling with
3 mental health issues.

4 Q. Do you know whether that parent had
5 any addiction issues?

6 A. I'm unaware about that.

7 Q. When did the next child come -- or
8 how long was that child in your care?

9 A. She was in my home about two weeks.

10 Q. Was that child reunited with her
11 parent to your knowledge?

12 A. She was eventually reunited with
13 her parent, yes.

14 Q. When did the next child come into
15 your care?

16 A. The next one was two children at
17 the same time, and they came October of 2017.

18 Q. What ages were those two children
19 when they came into your care?

20 A. They were nine and nine months.

21 Q. Do you have an understanding as to
22 why those two children came into your care?

23 A. Their parent had a substance abuse
24 issue.

25 Q. Do you know what substance that

1 parent abused?

2 A. Heroin.

3 Q. How long were those two children in
4 your care?

5 A. About four weeks.

6 Q. Do you know whether those two
7 children were reunited with their parent?

8 A. I'm unaware.

9 Q. Do you know where those two children
10 were placed after leaving your care?

11 A. They were placed with a relative.

12 Q. When was the next child placed into
13 your care?

14 A. The next child was November of
15 2017.

16 Q. How old was that child?

17 A. Three months old.

18 Q. Do you understand why that child
19 came into your care?

20 A. Yes. Because their parent had a
21 substance issue and they died.

22 Q. Do you know what substance the
23 parent had an issue with?

24 A. Heroin.

25 Q. Do you know whether that parent died

1 from their abuse of heroin?

2 A. They did.

3 Q. How long was that child in your
4 care?

5 A. About three months.

6 Q. Do you know where that child was
7 placed after leaving your care?

8 A. She was placed with a relative.

9 Q. When was the next child placed in
10 your care?

11 A. March of 2018.

12 Q. How old was that child?

13 A. He was two years old.

14 Q. How long was that child in your
15 care?

16 A. About three months.

17 Q. Do you understand why that child
18 came into your care?

19 A. Yes. His parents had a substance
20 abuse issue.

21 Q. Do you know what substance his
22 parents abused?

23 A. Heroin.

24 Q. Do you know where that child was
25 placed after leaving your care?

1 Q. Have you attended trainings related
2 to drug abuse for your foster care
3 responsibilities?

4 A. I believe so, yes.

5 Q. What topics were covered in relation
6 to drug abuse that you recall?

7 A. I believe just general things were
8 covered as far as what somebody with an
9 addiction will experience, what families
10 dealing with addiction will experience, and
11 what we might encounter when we foster children
12 that have had experience with addiction in
13 their family.

14 Q. Were any specific drugs mentioned in
15 your trainings?

16 A. I believe they were, but it's been
17 a long time.

18 Q. Do you recall what trainers
19 presented the trainings related to drug abuse?

20 A. I don't recall.

21 Q. Do you have access -- you said you
22 log in. Do you have access to a list, like a
23 transcript of all the trainings you've ever
24 taken as a foster parent?

25 A. I do have access to that.

1 Q. How far back do the records go that
2 you are able to access for your continuing
3 education credits?

4 A. I believe it goes all the way back
5 to when I was first licensed.

6 Q. Have you taken any trainings or
7 classes through the Foster Parent College
8 related to substance abuse?

9 A. I believe I have.

10 Q. Do you recall specifically that you
11 have?

12 A. I don't recall specifically, but
13 because it comes up a lot with the kids in my
14 home, I'm pretty sure I would have sought out a
15 class related to it.

16 Q. When was the first time you took a
17 training related to substance abuse for foster
18 care?

19 A. I'm not sure when I first would
20 have taken one. It's likely it would have been
21 between 2013 and 2016.

22 Q. Have you taken any classes through
23 the Foster Parent College about prescription
24 opioid abuse?

25 A. I don't believe I have.

1 A. Do you mean as it pertains to my
2 continuing education?

3 Q. Correct.

4 A. Yes, they have paid for -- anything
5 related to my required continuing education
6 they have paid for.

7 Q. For your husband has Lake County
8 also paid for every class and training he's
9 taken in connection with his continuing
10 education as a foster parent?

11 A. Yes, they have.

12 Q. Is your understanding that Lake
13 County pays for continuing education for foster
14 parents in the Lake County system?

15 A. That's my understanding, yes.

16 Q. What training, if any, have you
17 received from Lake County in relation to your
18 work as a foster parent for children with
19 neonatal abstinence syndrome?

20 A. If any, it would have been kind of
21 broad. I think it has come up at different
22 trainings as an issue that babies may have --
23 the babies that might come into your home will
24 have these issues. Not a lot was available
25 through the county. I had to seek it out

1 elsewhere.

2 Q. You say not a lot was available
3 through the county. Were there any trainings
4 available through the county?

5 A. In relation to --

6 Q. NAS.

7 A. In relation specifically to NAS, to
8 my knowledge, I don't remember a training for
9 that. I think when we had trainings related to
10 substance abuse, it was more broad and it kind
11 of covered a large scope of issues related to
12 substance abuse, and that would have been
13 included somewhere in there.

14 Q. Have you taken trainings as a foster
15 parent specific to caring for children with NAS?

16 A. Yes. I've taken it with Ronna
17 Johnson.

18 Q. Who paid for the neonatal abstinence
19 syndrome trainings that you took with Ronna
20 Johnson?

21 A. It was either Lake County or the
22 Ohio Child Welfare Training Program.

23 Q. Is there any training related to
24 being a foster parent that you believe you need
25 but have not been able to receive?

1 A. Yes, I do.

2 Q. What trainings would those be?

3 A. I don't think they even exist.

4 There's definitely not enough training to
5 really understand the scope of substance abuse,
6 how it affects the child, how it affects the
7 parent, how it affects the bonding, how it
8 affects the visits and reunification. To my
9 knowledge, it doesn't even exist. If I could
10 imagine one, I'd create something myself.

11 Q. When you say there's not enough
12 training related to substance abuse and its
13 impact on foster children, is that specific to
14 neonatal abstinence syndrome impacted children?

15 A. Not necessarily. I think it's
16 related to all children impacted by substance
17 abuse issues within their family.

18 Q. Have you tried to seek out training
19 related to the substance abuse impact on foster
20 children?

21 A. I have. I've done it on my own.

22 Q. And what trainings have you done on
23 your own related to the substance abuse impact
24 on foster children?

25 A. I wouldn't call them trainings. I

1 would call it informal research. I would use
2 the internet. I would talk to families that
3 have struggled with substance abuse issues. I
4 would talk to the health professionals. I
5 talked to former -- the families of former
6 foster children and I've tried to kind of seek
7 out what their family looks like while they're
8 dealing with these issues.

9 Q. Have you considered Lake County Job
10 and Family Services effective in helping you as
11 a foster parent to care for children placed in
12 your care?

13 A. I think they did an adequate job,
14 yes.

15 Q. Do you consider Lake County Job and
16 Family Services effective in helping you as a
17 foster parent care for children placed in your
18 care due to substance abuse issues?

19 A. I think there's some -- there's
20 some lacking there. I think we'll see that
21 lacking in a lot of different agencies. I
22 don't think that effectiveness exists, so no.

23 Q. What do you mean by "there's some
24 lacking"?

25 A. I just think that substance abuse

1 issues, especially how it pertains to the
2 family dynamic, it's still really grossly
3 misunderstood by the agencies and the
4 healthcare systems and so it is very hard to
5 equip other people to deal with those issues,
6 especially foster parents, to come alongside
7 those children and families and help support
8 them through that process.

9 Q. Do you think that there are
10 trainings Lake County could provide that they're
11 not currently providing in relation to foster
12 care for children impacted by substance abuse
13 issues?

14 A. There may be.

15 Q. Have you tried to look for any?

16 A. Not personally, no. Not in the
17 sense of looking for training to introduce to
18 Lake County, but I've looked for training for
19 myself to better care for the kids and family
20 in my home.

21 Q. Do you know whether Lake County Job
22 and Family Services has tried to locate training
23 resources for children in foster care due to
24 substance abuse issues and been unable to
25 provide them?

1 A. I'm unaware of what they've tried
2 to do.

3 Q. When you say that you don't think
4 that effectiveness exists for training related
5 to care of foster children impacted by substance
6 abuse issues, what do you mean by that?

7 A. I mean there still exists a lot of
8 misunderstanding and biases with families that
9 are dealing with substance abuse issues. I
10 don't think healthcare professionals give the
11 same treatment to patients that are dealing
12 with substance abuse issues. It's kind of a
13 top-down issue; when the services aren't robust
14 enough in the community, it trickles down to
15 the families and it trickles down to any
16 training we might receive, it's just not good
17 enough to strengthen us so we can support the
18 families.

19 Q. If you had sort of exemplary
20 training that you could take to assist you in
21 caring for children in the foster system
22 impacted by substance abuse, what would that
23 cover?

24 A. I think it would have to cover a
25 wide range of issues. It would have to cover

1 childhood trauma and family trauma and domestic
2 violence and the cycle of abuse, how substance
3 abuse issues begin in families, how they affect
4 the non-abusers in a family, how that will
5 affect children going to school, how it will
6 affect their neighborhoods and their neighbors
7 and their jobs. It would -- it would have to
8 be a pretty robust education to be effective.

9 Q. What substances of abuse would need
10 to be covered by such a training?

11 A. Ideally, all of them, but probably
12 the ones that are -- are most an issue in our
13 county, especially Lake County, because we do
14 see a bit more heroin and meth in our county, I
15 think, and also alcohol abuse. Those would
16 have to definitely be included in that.

17 Q. Any other substances of abuse in
18 your opinion that would need to be covered by a
19 training to assist with foster care of children
20 impacted by substance abuse issues?

21 A. Like I said, ideally, all of them
22 would be covered, but I think the biggest ones
23 would be opioids, meth and alcohol.

24 Q. When you say "opioids," what do you
25 mean by that?

1 A. I mean any level of addiction
2 related to opioids.

3 Q. Are you including prescription
4 opioids in that?

5 A. If they are addicted to
6 prescriptions, then yes.

7 Q. When you say "if they are addicted,"
8 what do you mean by that?

9 A. If they are unable to refrain from
10 using them, I would consider that an addiction
11 or at least high risk for addiction.

12 Q. Do you know whether there are
13 children in foster care in Lake County who are
14 impacted by prescription opioid abuse?

15 A. I am not personally aware of any,
16 no.

17 Q. To your knowledge, the substances of
18 abuse most at issue in Lake County for foster
19 care are heroin, meth and alcohol; is that
20 correct?

21 A. That's correct.

22 Q. Any others?

23 A. Those are the biggest ones in my
24 experience.

25 Q. Do you have any idea of how much

1 A. Not really. Their medical history
2 will be not accessible to me, only their
3 child's would be, so unless they offer that
4 information voluntarily, I won't have access to
5 it.

6 Q. For the children you have fostered,
7 do you know the drug abuse history for their
8 parent or guardian?

9 A. I will only know it if they either
10 admit to it or if their child has tested
11 positive for it themselves.

12 Q. For the children you have fostered,
13 do you know what the first drug of abuse was for
14 their parent or guardian?

15 A. I wouldn't have that information.

16 Q. For the children you have fostered,
17 do you have or know the prescription history for
18 the parent or guardian?

19 A. I wouldn't have that information.

20 Q. Do you know how many parents of
21 foster children in Lake County have experienced
22 a drug overdose?

23 A. Outside of the children I fostered,
24 I don't know what that would be.

25 Q. In your experience I believe you

1 mentioned you had one child who you have cared
2 for who had neonatal abstinence syndrome; is
3 that correct?

4 A. That's correct.

5 Q. To the extent you mentioned other
6 children in your care who had been exposed to
7 drugs, had any of them experienced neonatal
8 abstinence syndrome earlier in their life?

9 A. No. I've only had one child
10 experience neonatal abstinence syndrome.

11 Q. Are you aware of whether there are
12 any children in foster care in Lake County with
13 neonatal abstinence syndrome who were not
14 exposed to an opioid?

15 A. Can you say that again?

16 Q. Are you aware of whether there are
17 any children in foster care in Lake County with
18 neonatal abstinence syndrome who were not
19 exposed to an opioid drug?

20 A. I don't know of any personally.

21 Q. Do you know of other children in
22 foster care in Lake County with neonatal
23 abstinence syndrome beyond the one child you
24 fostered?

25 A. Do you mean right now or am I aware

1 at any point?

2 Q. Let's go with at any point first.
3 Are you aware of at any point children with
4 neonatal abstinence syndrome who received foster
5 care in Lake County?

6 A. Yes, I am aware.

7 Q. How many children?

8 A. Off the top of my head, two.

9 Q. Does that include the one child you
10 fostered?

11 A. No, it does not.

12 Q. So counting the one child you
13 fostered, you're aware of three children who
14 have been in foster care in Lake County with
15 neonatal abstinence syndrome?

16 A. Yes.

17 Q. Do you know the substance that each
18 child was exposed to?

19 A. One was heroin and the other was
20 heroin and alcohol.

21 Q. Do you know whether Lake County
22 offers any programs to support children in
23 foster care that are affected by opioid use?

24 A. I'm not aware of any, no.

25 Q. Other than the trainings we

1 disorder?

2 A. This is the first I've heard of it.

3 Q. Do you know whether there are any
4 foster children in Lake County who are receiving
5 treatment for substance abuse issues?

6 A. I am not aware of any, no.

7 Q. Do you know whether there are any
8 foster children in Lake County who are receiving
9 any programs or services related to the opioid
10 epidemic?

11 A. I am not aware of any.

12 Q. Are you aware of any programs that
13 Lake County participates in to remedy or prevent
14 substance abuse more generally?

15 A. I am not aware of any.

16 Q. Do you know whether Lake County
17 provides any programs to support foster children
18 whose parents have substance abuse issues?

19 A. I am not aware of any.

20 Q. Are you aware of any programming for
21 intervention for infants exposed to drugs in
22 utero that Lake County provides?

23 A. I am not aware of any.

24 Q. Have you ever -- are you aware of
25 any foster children in Lake County whose parents

1 participated in the drug treatment court?

2 A. I am not sure if they participated
3 in the drug treatment court.

4 Q. Can you trace any harm suffered by
5 any child in foster care in Lake County to the
6 filling of an opioid prescription by a pharmacy
7 defendant in this case?

8 A. I'm unable to do that.

9 Q. Are you aware of any documents that
10 would trace the harm suffered by a child in
11 foster care in Lake County to the filling of an
12 opioid prescription by a pharmacy defendant?

13 A. I am not aware of any, no.

14 Q. Can you trace any harm suffered by a
15 child in foster care in Lake County today to
16 prescription opioids?

17 A. I'm not aware of any.

18 Q. Can you trace any harm currently
19 being suffered by a child in foster care in Lake
20 County to illicit opioids?

21 A. Yes.

22 Q. What illicit opioids can you trace
23 harm back to a foster child?

24 A. Which opioids did you say?

25 Q. Yes, which.

1 A. Heroin.

2 Q. Are there any other drugs that you
3 believe caused harm to children in foster care
4 in Lake County?

5 A. Heroin is the only one I'm
6 personally aware of.

7 Q. Are you aware of any wrongful
8 actions, any harm caused by a Defendant in this
9 case in Lake County related to opioids?

10 A. I am not aware of any.

11 Q. Have you heard the term "pill mill"?

12 A. I have.

13 Q. What's your understanding of what a
14 pill mill is?

15 A. My understanding is that it's a --
16 a doctor's office or medical location that is
17 overly prescribing prescription medication.

18 Q. Are you aware of any pill mills that
19 are active in Lake County?

20 A. I am not aware of any.

21 Q. Are you aware of any pill mills that
22 have ever been active in Lake County?

23 A. I don't think I'm aware of any.

24 Q. Are you aware of any Lake County
25 residents who have obtained prescription opioids